

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Newport News Division**

SEBRENA Y. TUCKER,

Plaintiff,

v.

Case No. 4:12-cv-69-AWA-DEM

**U.S. BANK NATIONAL ASSOCIATION,
AS TRUSTEE FOR THE STRUCTURED
ASSET SECURITIES CORP. MORTGAGE
PASS-THROUGH CERTIFICATES, 2006-EQ1,
et al.,**

Defendants.

SECOND CONSENT MOTION FOR EXTENSION OF TIME

COMES NOW the Plaintiff, Sebrena Tucker, by counsel and with the consent of the Defendant, moves court for an extension of time to file her responsive brief to Defendants' Motion to Dismiss until August 6, 2012, for the following reasons:

1. This case was originally filed in the Circuit Court for the City of Hampton and was removed to this Court on May 8, 2012.
2. Trial proceedings are in a very early stage.
3. Counsel for Plaintiff and Defendants are actively engaged in settlement discussions, which also includes a present agreement that the Defendants will evaluate a new application by the Plaintiff for a loan modification. This process can take more than 30 days.
4. No party will suffer prejudice as a result of this extension.
5. The extension is not sought for delay purposes, but so that justice may be served.
6. The extension will not cause any delay in the trial proceedings as no date has yet been set for a scheduling conference and no trial date is set.

7. The extension will conserve judicial resources and promote efficiency by allowing the parties time to attempt to resolve their differences by compromise or narrow the areas of dispute.

8. Defendants' counsel agrees to the requested extension. An Agreed Order is being circulated for original signatures, a copy of which is attached hereto.

WHEREFORE Plaintiff respectfully requests that the court grant her request for an extension of time for Plaintiff to file her responsive pleading to Defendants' Motion to Dismiss from June 5, 2012, to on or before August 6, 2012.

SEBRENA TUCKER

By: /s/
Susan M. Rotkis, VSB #40693
Attorney for Sebrene Y. Tucker
Consumer Litigation Associates, PC
763 J. Clyde Morris Blvd, Suite 1-A
Newport News, Virginia 23601
Telephone: (757) 930-3660
Facsimile: (757) 930-3662
srotkis@clalegal.com

CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of June, 2012, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system which will then send a notification of such filing (NEF) to the following:

Hunter W. Sims, Jr., VSB #9218
J. Bradley Reaves, VSB #71389
R. Ellen Coley, VSB #75970
Kaufman & Canoles, P.C.
150 West Main Street, Suite 2100
Norfolk, VA 23510
Telephone: (757) 624-3000
Facsimile: (757) 624-3169

By: /s/
Susan M. Rotkis, VSB #40693

Attorney for Sebreana Y. Tucker
Consumer Litigation Associates, PC
763 J. Clyde Morris Blvd, Suite 1-A
Newport News, Virginia 23601
Telephone: (757) 930-3660
Facsimile: (757) 930-3662
srotkis@clalegal.com